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17 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
18 and OTTOMOTTO LLC

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA
21 SAN FRANCISCO DIVISION

22 WAYMO LLC,
23 Plaintiff,
24 v.
25 UBER TECHNOLOGIES, INC.,
26 OTTOMOTTO LLC; OTTO TRUCKING LLC,
27 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF
DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
PORTIONS OF THEIR RESPONSE TO
WAYMO LLC'S SUPPLEMENTAL
BRIEF FOR MOTION FOR ORDER
TO SHOW CAUSE**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Defendants' Administrative Motion to File Under Seal Portions of Their Response to
6 Waymo LLC's Supplemental Brief for Motion for Order to Show Cause.

7 2. I have reviewed the following documents and confirmed that only the portions
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Waymo's Supplemental Brief ("Response")	Highlighted Portions	Defendants (blue) Non-parties Sandstone Group, Tyto LiDAR, and Ognen Stojanovski (yellow)
Exhibit 2	Entirety	Non-parties Sandstone Group, Tyto LiDAR, and Ognen Stojanovski (yellow)

17 3. The blue-highlighted portions of the Response contain highly confidential
18 information regarding a confidential potential vendor relating to LiDAR for Defendants. This
19 highly confidential information is not publicly known, and its confidentiality is strictly
20 maintained. Defendants request this information be kept under seal to protect the confidentiality
21 of the identity of this potential vendor. I understand that disclosure of the identity of this
22 confidential vendor would allow Uber's competitors to understand Uber's development strategy,
23 such that they could tailor their own development of LiDAR and Uber's competitive standing
24 could be significantly harmed.

25 4. The yellow-highlighted portions of the Response and the entirety of Exhibit 2
26 contain confidential information of non-parties Sandstone Group, Tyto LiDAR, and Ognen
27 Stojanovski, who have requested that their confidentiality interests be respected in this
28

1 proceeding. (Dkt. 1533.) Defendants expect these non-parties to file supporting declarations if
2 needed.

3 5. Defendants' request to seal is narrowly tailored to the portions of the Declaration
4 and its supporting papers that merit sealing.

5 I declare under penalty of perjury that the foregoing is true and correct. Executed this
6 15th day of September, 2017 in San Francisco, CA.

7
8 /s/ Michelle Yang

Michelle Yang

9
10
11 **ATTESTATION OF E-FILED SIGNATURE**

12 I, Arturo J. González am the ECF User whose ID and password are being used to file this
13 Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has
14 concurred in this filing.

15 Dated: September 15, 2017

16 /s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ